

REMARKS

In an Office action mailed on July 12, 2007, the Examiner considered the pending claims 1-50 following which: (1) applicant's election with traverse of "claims 1-31" in the reply files October 2, 2006 is acknowledged; (2) claims 1-5, 7-12 and 32-50 are withdrawn from further consideration pursuant to 37 CFR 1.142(b), as being drawn to a non-elected invention; (3) claim 6 is rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 6,300,679 to Mukerji et al. ("Mukerji"); (4) claims 13-31 are rejected under 35 U.S.C. 103(a) as being unpatentable over Mukerji in view of U.S. Patent No. 6,266,252 to Karabatsos ("Karabatsos"). The Applicants respectfully submit the following remarks concerning the July 12, 2007 Action.

As set forth in the **Amendments to the Claims** and **Listing of Claims** sections of this paper, Applicants hereby amend claim 6 and cancel claims 1-5, 7-12, 18, 26, 29 and 32-50, without prejudice or disclaimer. No new matter has been introduced by such amendments, which are fully supported by the original disclosure.

Rejection of Claims under 35 U.S.C. § 102(b)

Claim 6 is rejected under 35 U.S.C. 102(b) anticipated by U.S. Patent No. 6,300,679 to Mukerji. This rejection is respectfully traversed.

At the outset, Applicants note that, when applying a reference under §102(b), "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). More specifically, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Claim 6 is directed to a high-density circuit module including a form standard that defines a standard sized form, and a flex circuit that is at least partially disposed about the form standard. In this manner, the form standard operates as a mandrel for shaping the flex circuit as it folds about the form standard. Mukerji fails to disclose a high-density circuit module

including a form standard that defines a standard sized form, and a flex circuit that is at least partially disposed about the form standard.

Mukerji describes a flexible substrate for packaging a semiconductor component. A layer of conductive traces are formed on the substrate. An electrically insulating layer or mask can be applied over the traces to prevent the traces from directly contacting a semiconductor chip (see col. 4, lines 16-22). More specifically, the substrate having the trace and mask layers formed thereon, is folded around a semiconductor chip (see col. 4, lines 4-8).

The Examiner has asserted that the mask layer 512 of Fig. 5 is a form standard. This assertion, however, is incorrect. The mask layer of Mukerji is a flexible, electrical insulation layer that is applied over the traces to prevent the traces from directly contacting the semiconductor chip. Having applied the mask layer to the flat substrate, the substrate is subsequently folded around the semiconductor, with the mask layer correspondingly flexing as the substrate is folded. Consequently, the mask layer does not operate as a mandrel that forms the shape of the folded substrate. Accordingly, the mask layer is not a form standard that defines a standardized form, and is instead a simple insulation layer.

In view of the foregoing, Mukerji does not disclose a high-density circuit module including a form standard that defines a standard sized form, and a flex circuit that is at least partially disposed about the form standard. Consequently, Mukerji fails to describe each and every element as set forth in claim 6, and does not disclose the identical invention in as complete detail as is contained in claim 6, as required when applying a reference under §102(b). Therefore, reconsideration and withdraw of the rejection are respectfully requested.

Rejection of Claims under 35 U.S.C. § 103(a)

Claims 13-31 are rejected under 35 U.S.C. 103(a) as being unpatentable over Mukerji in view of Karabatsos. This rejection is respectfully traversed.

Claims 18, 26 and 29 have been cancelled without prejudice or disclaimer. Consequently, the rejection of claims 18, 26 and 29 has been rendered moot.

Each of claims 13-17, 19-25, 27, 28, 30 and 31 ultimately depends from claim 6, which defines over the prior art, as discussed in detail above. Accordingly, each of claims 13-17, 19-25, 27, 28, 30 and 31 also define over the prior art for at least the same reasons as claim 6. Therefore, reconsideration and withdrawal of the rejections are respectfully requested.

CONCLUSION

In view of the reasons given above, reconsideration of the pending application and the timely allowance of pending claims 6, 13-17, 19-25, 27, 28, 30 and 31 is respectfully requested.

It is believed that this paper addresses all of the rejected claims and other matters sufficiently to support the allowance of all of the pending claims. The July 12, 2007 Office action contains a number of statements potentially reflecting characterizations of various claims, supporting descriptions, and/or patent or patent application references, but regardless of whether any such statements are addressed in this response, the Principal (as defined in 37 C.F.R. § 1.32(a)(3)) declines to automatically subscribe to any statement or characterization in the Office action. Although the Examiner's rejection of claims 6, 13-17, 19-25, 27, 28, 30 and 31 has been traversed as set forth above without reference to many of such statements, all rights to dispute statements regarding such rejections later in any subsequent applications or causes of action relating to this application or any other application are expressly reserved. Accordingly, the absence of a reply to a specific rejection, issue, or comment does not signify agreement with or concession of that rejection, issue, or comment. In addition, because the arguments made above may not be exhaustive, there may be reason for patentability of any or all pending claims (or other claims) that have not been expressed. Nothing in this paper should be construed as conceding any issue with regard to any claim except as specifically and

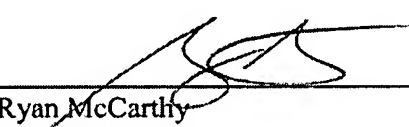
expressly stated in this paper, and the amendment of any claim should not be construed as conceding the unpatentability of the claim prior to amendment except as specifically and expressly stated in this paper.

The Commissioner is hereby authorized by this written request to treat this or any concurrent or future reply that requires a petition for an extension of time under 37 C.F.R. § 1.136(a) for its timely submission as incorporating a petition for extension of time for the appropriate length of time. The Commissioner is further authorized to charge all required fees, including without limitation excess claim fees or other fees under 37 C.F.R. § 1.16 or any required extension of time fees or other fees under 37 C.F.R. § 1.17, to Deposit Account No. 06-1050, on which the undersigned is authorized to sign, and to treat such authorization to charge Deposit Account No. 06-1050 as a constructive petition for an extension of time in this or any concurrent or future reply requiring a petition for an extension of time under 37 C.F.R. § 1.136(a) for its timely submission. The Commissioner is further hereby authorized to credit any overpayment to Deposit Account No. 06-1050.

Please direct all correspondence in this application to **PTO CUSTOMER NO: 26201**.

Respectfully submitted,

Date: November 5, 2007



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